REMARKS

The Specification has been amended. Claims 1, 3, 5, 7, 9 - 10, and 17 have been amended. No new matter has been introduced with these amendments, all of which are supported in the application as originally filed. Claims 2, 4, 6, 8, and 14 - 16 have been cancelled from the application without prejudice. Claims 1, 3, 5, 7, 9 - 13, and 17 remain in the application.

Applicant is <u>not</u> conceding that the subject matter encompassed by the claims as presented prior to this Amendment is not patentable over the art cited by the Examiner, as claim amendments and cancellations in the present application are directed toward facilitating expeditious prosecution of the application and allowance of the currently-presented claims at an early date. Applicant respectfully reserves the right to pursue claims, including the subject matter encompassed by the claims as presented prior to this Amendment and additional claims, in one or more continuing applications.

I.   <u>Rejection under 35 U.S.C. §102(b)</u>

Paragraph 4 of the Office Action dated March 26, 2008 (hereinafter, "the Office Action") states that Claims 1 - 6 and 8 - 17 (which Applicant notes should read "9 - 17", as a rejection of <u>Claim 8</u> is provided in <u>paragraph 6</u> of the Office Action but <u>not</u> in paragraph 4) are rejected under 35 U.S.C. §102(b) as being anticipated by "Resource Description Framework (RDF) Model and Syntax Specification" (hereinafter, "RDF Syntax"). Claims 2, 4, 6, 8, and

14 - 16 have been cancelled from the application without prejudice, rendering the rejection moot as to those claims. This rejection is respectfully traversed with regard to the remaining claims as currently presented.

Referring first to independent Claim 1, Applicant respectfully submits that RDF Syntax fails to teach, or suggest, all of the claim language recited in Claim 1, as will now be discussed.

As discussed with the Examiner on April 25, 2008, Applicant respectfully submits that RDF Syntax does not disclose "specifying a value of the naming rule property for each of the class definitions ..." as recited in the claim language on lines 11 - 21 of Claim 1. Instead, it appears that RDF Syntax uses an implicit (or "default") approach for naming instances, whereby "Resources are always named by URIs plus optional anchor IDs", as stated in Section 2.1 "Basic RDF Model" under the "Resources" paragraph, lines 7 - 8 (emphasis added). Always using a URI, as disclosed by RDF Syntax, is different from Applicant's claim language; see, for example, lines 20 - 21 of Claim 1, stating that "the value of the naming rule property for at least two of the class definitions differs".

Applicant also respectfully notes that the diagram shown in Figure 2 of RDF Syntax does not disclose a naming rule property and an instance rule property as recited in Applicant's Claim 1. In the example illustrated by Figure 2, the resource corresponds to the topmost oval,

and the "Creator" property is associated therewith and has, as its value, a complex type (shown as the empty oval). The complex type has associated therewith two properties, namely "Name" and "Email", and the value of each of these properties is shown as a rectangle. However, Applicant respectfully submits that <u>neither</u> the Creator property nor a combination of the Name and Email property can be aligned to his claimed "naming rule property", as none of these properties or combination thereof appears to be usable to "ensure that [the instance identity] generated for the [instance shown in Figure 2] is <u>unique</u> ...", referring (by contrast) to claim language which appears at lines 14 - 16 of Applicant's Claim 1 (emphasis added). For example, in a resource development environment, it is highly uniquely that <u>each</u> resource is created by a separate person; accordingly, the resource cannot be <u>uniquely</u> named by specifying the name (and/or email) of its creator.

Furthermore, Applicant respectfully submits that the paragraph following Figure 2 which begins "The structured entity ..." is discussing the <u>complex type</u> that is shown in Figure 2 as the empty oval. While RDF Syntax does state that this structured type "can also be assigned a unique identifier", Applicant respectfully submits that RDF Syntax does not disclose a <u>naming rule property</u> corresponding to this unique identifier, and also does not disclose that such naming rule property specifies, as its value, "... at least one property name selected from a collection of property names comprising the class definition", in contrast to Applicant's claim language as recited on lines 11 - 13 of Claim 1.

Applicant also notes that Claim 1 recites, at lines 17 - 19, "the value of the naming rule property specified in at least one of the class definitions comprises <u>at least two of the property names</u> selected from the collection of property names comprising the class definition" (emphasis added). This is supported in Applicant's specification as originally filed. See, for example, page 19, lines 17 - 18, which refer to "one or more property name/value pairs" and the subsequent syntax definition at line 2 of page 20, which uses the "*" convention to indicate 0 or more <u>repetitions</u> of the syntax enclosed within the square brackets (noting that one name/value pair is specified <u>outside</u> the square brackets, thus indicating that <u>each</u> identity must specify at least this <u>one</u> occurrence of the name/value pair). See also the discussion on page 20, line 20 - page 21, line 2, stating "If a class requires more than one property (i.e., more than one property name/value pair) to uniquely identify it ...". Accordingly, it can be seen that this claim language recited at lines 17 - 19 of Claim 1 is supported in the specification.

Applicant also respectfully submits that RDF Syntax fails to disclose the claim language recited at lines 22 - 30 of Claim 1. Independent Claim 1 is therefore deemed patentable over RDF Syntax. Dependent Claims 3, 5, 7, and 9 - 13 are deemed patentable at least by virtue of the patentability of Claim 1 from which they depend.

Referring next to independent Claim 17, Applicant respectfully notes that the Office Action analysis of this claims refers to "the remarks and discussions made [with regard to] claim 1" (Office Action, page 6, last 2 lines). Applicant therefore respectfully submits that the

same arguments presented above with regard to Claim 1 apply in an analogous manner to distinguish Claim 17 from RDF Syntax (referring in particular to claim language recited on lines 7 - 23 of Claim 17 as currently presented), and Claim 17 is therefore deemed patentable over RDF Syntax.

In view of the above, the Examiner is respectfully requested to withdraw the §102 rejection of all claims as currently presented.

II.   Rejection under 35 U.S.C. §103(a)

Paragraph 6 of the Office Action states that Claims 7 - 8 are rejected under 35 U.S.C. §103(a) as being unpatentable over RDF Syntax in view of "RDF Vocabulary Description Language 1.0: RDF Schema" (hereinafter, "RDF Schema"). Claim 7 has been cancelled from the application without prejudice, rendering the rejection moot as to that claim. This rejection is respectfully traversed with regard to Claim 8.

Applicant has demonstrated, above, that RDF Syntax does not anticipate Claim 1 (and Applicant respectfully notes that his previously-submitted Amendment/Response dated December 18, 2007 contained a typographical error in this regard, inadvertently omitting the "not"). The cited RDF Schema fails to cure the above-noted deficiencies of RDF Syntax. Dependent Claim 8 is therefore deemed patentable by virtue of at least the patentability of independent Claim 1 from which it depends.

The Examiner is therefore respectfully requested to withdraw the §103 rejection.

III.   Conclusion

Applicant respectfully requests reconsideration of the pending rejected claims,

withdrawal of all presently outstanding rejections, and allowance of all remaining claims at an

early date.

Respectfully submitted,

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